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March 17, 2020

**VIA ECF AND ELECTRONIC MAIL**

Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Viviana Espinosa v. Weill Cornell Medical College*,  
Case No. 1:18-cv-11665 (AT)

Dear Judge Torres:

This law firm represents Defendant Weill Cornell Medical College (“Defendant”) in the above-referenced matter. Defendant submits this letter jointly with Plaintiff Viviana Espinosa (“Plaintiff,” and, together with Defendant, the “Parties”) to respectfully request an extension of the summary judgment briefing deadlines in this matter due to unforeseen circumstances related to the Coronavirus pandemic. This is the Parties’ first request to extend the summary judgment briefing schedule.

In an effort to follow federally-recommended guidelines to deter the spread of the virus, the law offices of counsel for the Parties have been closed, or are operating at limited capacity, and counsel for the Parties is currently transitioning to remote work. As the Court is undoubtedly aware, this is hugely disruptive to our respective practices. Although we are able to work remotely and prepared to do so diligently, we are working in a limited capacity and with reduced access to records and lines of communication necessary to the process of summary judgment briefing. Further, Defendant is a healthcare provider and is currently navigating the uncharted waters of providing a healthcare response to the danger the Coronavirus presents to the general public. Understandably, Defendant, its medical staff, and its in-house attorneys are primarily focused on this unprecedented effort, which is occupying a large amount of their time and limiting the amount of time that can be dedicated to litigation matters. Finally, the closure of the school system has added additional time-management challenges for the undersigned in a remote work capacity.

In light of these currently-known disruptive consequences of the Coronavirus, the Parties respectfully request the Court's endorsement of the following adjusted summary judgment briefing schedule:

Defendant's Motion Papers Due:	April 24, 2020
Plaintiff's Opposition Due:	June 1, 2020
Defendant's Reply Due:	June 15, 2020

Counsel notes that the government's and our firms' response to these issues are currently fluid and may change as the ongoing pandemic evolves. However, the Parties are dedicated to observing these above-requested deadlines based on the current circumstances. On behalf of the Parties, we hope that Your Honor and the Court staff are well and thank the Court for its time and consideration.

Sincerely,

/s/ Benjamin E. Stockman  
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GRANTED. By **April 24, 2020**, Defendant shall file its motion for summary judgment. By **June 1, 2020**, Plaintiff shall file her opposition. By **June 15, 2020**, Defendant shall file its reply, if any.

SO ORDERED.

Dated: March 17, 2020  
New York, New York



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ANALISA TORRES  
United States District Judge